

JUDGE ANDRÉ BIROTTE JR.
SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET

Please complete this worksheet jointly and file it with your Joint Rule 26(f) Report.
The Court ORDERS the parties to make every effort to agree on dates.

Case No. 2:24-cv-04802-AB-AJR	Case Name: <i>Elizabeth Waterman v. TikTok Inc.</i>		
Trial and Final Pretrial Conference Dates		Plaintiff's Proposed Date mm/dd/yyyy	Defendant's Proposed Date mm/dd/yyyy
Check one: <input checked="" type="checkbox"/> Jury Trial or <input type="checkbox"/> Court Trial [Monday at 8:30 a.m., about 18 months after Complaint filed] Estimated Duration, in days:		10/27/2025 5 days	10/27/2025 5 days
Final Pretrial Conference ("FPTC") [L.R. 16], Hearing on Motions In Limine [Friday at 11:00 a.m., at least 17 days before trial]		10/10/2025	10/10/2025
Event¹ <u>Note:</u> Hearings must be on Fridays at 10:00 a.m. Other dates can be any day of the week.	Suggest. Weeks Before FPTC²	Plaintiff's Proposed Date mm/dd/yyyy	Defendant's Proposed Date mm/dd/yyyy
Last Date to <u>Hear</u> Motions to Amend Pleadings/Add Parties <i>[Friday]</i>	12-16 weeks after Sched. Conf.	02/07/2025	01/24/2025
Non-Expert Discovery Cut-Off (no later than deadline for <u>filing</u> dispositive motion)	17	06/06/2025	05/16/2025
Expert Disclosure (Initial)		06/06/2025	05/23/2025
Expert Disclosure (Rebuttal)		06/20/2025	06/06/2025
Expert Discovery Cut-Off	12 ³	07/03/2025	06/20/2025
Last Date to <u>Hear</u> Motions <i>[Friday]</i> • Rule 56 Motion due at least 5 weeks before hearing • Opposition due 2 weeks after Motion is filed • Reply due 1 week after Opposition is filed <u>For Cross-Motions, see Standing Order.</u>	12	09/05/2025	08/01/2025
Deadline to Complete Settlement Conference [L.R. 16-15]	10	09/05/2025	08/22/2025
<u>Alternative Dispute Resolution ("ADR") Procedure (select one):</u> (Magistrate Judge <i>[with Court approval]</i> , Court's Mediation Panel, or Private Mediation)		<input checked="" type="checkbox"/> 1. Mag. Judge <input checked="" type="checkbox"/> 2. Panel <input type="checkbox"/> 3. Private	<input type="checkbox"/> 1. Mag. Judge <input type="checkbox"/> 2. Panel <input checked="" type="checkbox"/> 3. Private
<u>Trial Filings (first round)</u> • Motions In Limine • Memoranda of Contentions of Fact and Law [L.R. 16-4] • Witness Lists [L.R. 16-5] • Joint Exhibit List [L.R. 16-6.1] • Joint Status Report Regarding Settlement • Proposed Findings of Fact and Conclusions of Law [L.R. 52] (<i>court trial only</i>) • Declarations containing Direct Testimony, if ordered (<i>court trial only</i>)	3 minimum	09/12/2025	08/29/2025
<u>Trial Filings (second round)</u> • Oppositions to Motions In Limine • Joint Proposed Final Pretrial Conference Order [L.R. 16-7] • Joint/Agreed Proposed Jury Instructions (<i>jury trial only</i>) • Disputed Proposed Jury Instructions (<i>jury trial only</i>) • Joint Proposed Verdict Forms (<i>jury trial only</i>) • Joint Proposed Statement of the Case (<i>jury trial only</i>) • Proposed Additional Voir Dire Questions, if any (<i>jury trial only</i>) • Evidentiary Objections to Decs. of Direct Testimony (<i>court trial only</i>)	2 minimum	09/26/2025	09/12/2025

[REVISED MARCH 15, 2024]

¹ The parties may seek dates for additional events by filing a separate Stipulation and Proposed Order.
This is often appropriate for class actions, patent cases, and ERISA cases.

² This is the Court's recommended default timeline for certain events. The parties are welcome to propose different intervals as needed for their case.

³ The parties may wish to consider cutting off expert discovery prior to the deadline for **filing** an MSJ.